<center>REMARKS</center>

RESTRICTION REQUIREMENT UNDER 35 U.S.C § 121

The Applicant affirms the election of claims 29-71 for prosecution as required by the Examiner in the Office Action. Claims 1-28 have been withdrawn.

REJECTIONS UNDER 35 U.S.C. § 102

Claims 29-32, 35-39, 41-49, 55, 56, 59, and 63 were rejected under 35 U.S.C § 102(e) as being unpatentable over U.S. Patent No. 5,761,424 issued to Adams et al. (*Adams*). Claims 30, and 43-46 have been canceled and therefore the rejection of these claims is moot. Applicant submits that claims 29, 31-32, 35-39, 41-42, 47-49, 55, 56, 59, and 63 are not anticipated by *Adams* for at least the reasons described below.

Independent claim 29 recites the following:

> **a filtering database comprising layered rule tables**, wherein each rule table comprises a protocol element locator and a default rule; and
> a packet filtering engine coupled to the filtering database for filtering said packets using at least one rule table in the filtering database.

Thus, Applicant claims a filtering database comprising layered rule tables. Independent claims 37, 47, and 55 similarly recite layered rule tables.

The Office Action cites *Adams* as disclosing the invention as claimed by Applicant in claims 29, 37, 47, and 55. *Adams* discusses a variable number of rules within a single rules field, which serve to further qualify recognition of a received packet. However, *Adams* does not disclose **a filtering database comprising layered rule tables** as claimed by Applicant. (See Applicant's figure 3 as an example of layered rule tables.) Therefore, Applicant submits that claims 29, 37, 47, and 55 are not anticipated by *Adams*.

Claims 31, 32, 35, and 36 depend from claim 29. Claims 38, 39, 41, and 42 depend from claim 37. Claims 48-49 depend from claim 47. Claims 56 and 59 depend from claim 55. Given that dependent claims necessarily include the limitations of the claims from which they depend, Applicant respectfully submits that claims 30-36, 38-39, 41-42, 48-49, 56 and 59 are not anticipated by *Adams*.

The Office Action cites *Adams* as disclosing the limitations of Applicant's claim 63. Claim 63 recites a filtering engine for receiving the packet prototype from an external software source. *Adams* does not disclose receiving a packet prototype from an external software source as claimed by Applicant. Therefore, Applicant submits *Adams* does not anticipate claim 63.

REJECTIONS UNDER 35 U.S.C. § 103

Claims 50-54, 57, 58, and 64-71 were rejected under 35 U.S.C. § 103(a) as being unpatentable over *Adams* in view of U.S. Patent No. 5,951,651 issued to Lakshman et al. (*Lakshman*). Claims 50-54, and 65-71 have been canceled, and thus the rejection of these claims is moot. Applicant submits that remaining claims 57, 58, and 64 are not rendered obvious by *Adams* in view of *Lakshman* for at least the reasons described below.

Claims 57 and 58 depend from claim 55, which recites a filtering database containing layered tables of rule tables. As discussed above, *Adams* does not disclose this limitation. *Lakshman* fails to cure the deficiencies of *Adams*. Therefore, Applicant respectfully submits *Adams* in view of *Lakshman* does not render claims 57 and 58 obvious.

Claim 64 from claim 63, which recites a filtering engine for receiving the packet prototype from an external software source. As discussed above, *Adams* does not disclose this limitation. *Lakshman* fails to cure the deficiencies of *Adams*. Therefore, Applicant respectfully submits *Adams* in view of *Lakshman* does not render claim 64 obvious.

Claims 60-61 were rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S.

Patent No. 5,414,704 issued to Spinney (*Spinney*). Applicant submits that claims 60-61 are not

rendered obvious in view of *Spinney* for at least the reasons described below.

Independent claim 60 recites a system for filtering packets in parallel comprising:

> a packet data interface, for receiving a packet; and
> a parallel filtering database coupled to the packet data interface, the
> parallel filtering database for evaluating rules in a single rule table in parallel.

Thus, Applicant claims a system for filtering packets in parallel. The Office Action cites

Spinney as disclosing the limitations of claim 60. *Spinney* discusses taking addresses that collide

with addresses in a hash bucket and storing them in a CAM. *Spinney* states, "since every address

is compared with the CAM entries anyway...this compare in the CAM is done in parallel with

the hash function." See col. 16, lines 43-47. Performing a compare in the CAM in parallel with

a hash function is not the same as a parallel filtering database that evaluates rules in a single rule

table in parallel. *Spinney* does not teach or disclose evaluating rules in a single rule table in

parallel as claimed in claim 60. Therefore, Applicant respectfully submits that claim 60 is not

obvious in view of *Spinney*.

Claim 61 depends from claim 60. For at least the reason that dependent claims include

the limitations of the claims from which they depend, Applicant respectfully submits that claim

61 is not rendered obvious by *Spinney*.

Claim 62 also depends from claim 60. Claim 62 was rejected under 35 U.S.C. 103(a) as

being unpatentable over *Spinney* in view of *Lakshman*. The Office Action states that *Spinney*

does not disclose the limitation "a packet prototype for modifying the parallel filtering database."

The Office Action then cites *Lakshman* as disclosing "a packet prototype for modifying the

parallel filtering database." Whether or not *Lakshman* actually discloses the limitation cited in

the Office Action, which Applicant does not concede, *Lakshman* does not teach or disclose evaluating rules in a single rule table in parallel as claimed by Applicant in claim 60. Therefore, *Lakshman* fails to cure the deficiencies of *Spinney*. Given that dependent claims necessarily include the limitations of the claims from which they depend, Applicant respectfully submits that claim 62 is not rendered obvious by *Spinney* in view of *Lakshman*.

Claims 33, 34, and 40 were rejected under 35 U.S.C. § 103(a) as being unpatentable over *Adams* in view of U.S. Patent Application Publication No. US 2002/0010793 published by Noll, et al. (*Noll*). Applicant submits that claims 33, 34, and 40 are not rendered obvious by *Adams* in view of *Noll* for at least the reasons described below.

As discussed above, *Adams* fails to disclose a filtering database comprising layered rule tables as claimed in claims 29 and 37. *Noll* is cited as disclosing a filtering system in a packet network that comprises statistics counters. Even assuming *Noll* discloses the limitations cited in the Office Action, which Applicant does not concede, *Noll* does not cure the deficiencies *Adams* as discussed above. Claims 33 and 34 depend from claim 29. Claim 40 depends from claim 37. Given that dependent claims necessarily include the limitations of the claims from which they depend, Applicant respectfully submits that claims 33, 34 and 40 are not obvious in view of *Adams* and *Noll*.

NEW CLAIMS

Claims 72-83 have been added. Independent claims 72 and 77 include limitations similar to the limitations found in independent claims 29, 37, 47, and 55. For reasons similar to those discussed in relation to claims 29, 37, 47, and 55, Applicant respectfully submits that *Adams* does not disclose the limitations of claims 72 and 77. Therefore, Applicant submits that claims

72 and 77 are patentable over *Adams*. Claims 73-76 depend from claim 72. Claims 78-83

depend from claim 77. Given that dependent claims necessarily include the limitations of the

independent claims, Applicant submits that claims 73-76, and 78-83 are patentable over *Adams*.
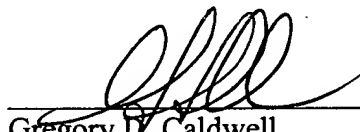
CONCLUSION

For at least the foregoing reasons, Applicants submit that the rejections have been overcome. Therefore, claims 29, 31-42, 47-49, 55-64, and 72-83 are in condition for allowance and such action is earnestly solicited. The Examiner is respectfully requested to contact the undersigned by telephone if such contact would further the examination of the present application. Applicants have included a copy of all claims in the attached index for the Examiner's convenience.

Please charge any shortages and credit any overcharges to our Deposit Account number 02-2666.

Respectfully submitted,
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